

Judge Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MAKAH INDIAN TRIBE,

Plaintiff,

v.

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, BP
P.L.C., BP AMERICA INC., CHEVRON
CORPORATION, CHEVRON USA, INC.,
SHELL PLC, SHELL OIL COMPANY,
CONOCOPHILLIPS, CONOCOPHILLIPS
COMPANY, PHILLIPS 66, and PHILLIPS
66 COMPANY,

Defendants.

No. 2:24-cv-00157-JNW

CORPORATE DISCLOSURE
STATEMENT BY DEFENDANTS
SHELL PLC AND SHELL USA, INC.

Pursuant to Federal Rule of Civil Procedure 7.1 and Local Civil Rule 7.1, Defendants Shell plc (f/k/a Royal Dutch Shell plc) and Shell USA, Inc. (f/k/a Shell Oil Company) hereby make the following disclosures:

Shell plc is a publicly held company organized under the laws of the United Kingdom. Shell plc does not have any parent corporations, and no publicly traded company owns 10 percent or more of Shell plc's stock.

Shell USA, Inc. is a wholly owned subsidiary of Shell Petroleum Inc., whose ultimate corporate parent is Shell plc. No other publicly held company owns 10 percent or more of the stock of Shell USA, Inc.

1 This statement is filed solely for purposes of complying with Federal Rule of Civil
2 Procedure 7.1 and Local Civil Rule 7.1, and in order that the Judges of this Court may
3 determine the need for recusal. This statement is not intended to operate as an admission of
4 any factual allegation or legal conclusion and is submitted subject to and without waiver of
5 any right, defense, affirmative defense, or objection, including, but in no way limited to,
6 venue, service, and personal jurisdiction.

7 DATED this 7th day of March, 2024.

8 K&L GATES LLP

9
10 By s/Kari L. Vander Stoep
11 Kari L. Vander Stoep, WSBA #35923
12 925 Fourth Avenue, Suite 2900
13 Seattle, WA 98104
14 Phone: (206) 623-7580
15 Fax: (206) 623-7022
16 E-mail: kari.vanderstoep@klgates.com

17 David C. Frederick (*pro hac vice* forthcoming)
18 James M. Webster, III (*pro hac vice* forthcoming)
19 Daniel S. Severson (*pro hac vice* forthcoming)
20 Daren G. Zhang (*pro hac vice* forthcoming)
21 KELLOGG, HANSEN, TODD,
22 FIGEL & FREDERICK, P.L.L.C.
23 1615 M Street, N.W., Suite 400
24 Washington, D.C. 20036
25 Tel.: (202) 326-7900
26 Fax: (202) 326-7999
Email: dfrederick@kellogghansen.com
Email: jwebster@kellogghansen.com
Email: dseverson@kellogghansen.com
Email: dzhang@kellogghansen.com

*Counsel for Shell plc and
Shell USA, Inc. (f/k/a Shell Oil Company)*